REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-5, 7-24, 26-43, and 45-78 are presently active in this case, Claims 1, 7, 8, 11, 20, 26, 27, 30, 39, 45, 46, 49, 58, 60, 61, 65, 67, 68, 72, 74, and 75 having been amended and Claims 6, 25, and 44 having been canceled without prejudice or disclaimer by way of the present Amendment.

In the outstanding Official Action, Claims 1-4, 6-12, 15-23, 25-31, 34-42, 44-50, 53-63, 65-70, and 72-77 were rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao et al. (U.S. Patent No. 6,141,753) in view of Stefik et al. (U.S. Patent No. 6,233,684). Claims 5, 24, 43, 64, 71, and 78 were rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao et al. in view of Stefik et al. and further in view of Houser et al. (U.S. Patent No. 5,606,609). Claims 13, 14, 32, 33, 51, and 52 were rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao et al. in view of Stefik et al. and further in view items upon which Official Notice has been taken. For the reasons discussed below, the Applicants request the withdrawal of the art rejections.

The basic requirements for establishing a *prima facie* case of obviousness as set forth in MPEP 2143 include (1) there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings, (2) there must be a reasonable expectation of success, and (3) the reference (or references when combined) must teach or suggest all of the claim limitations. The Applicant submits that a *prima facie* case of

14

obviousness cannot be established in the present case because the reference, either taken singularly or in combination, do not teach or suggest all of the claim limitations.

Claim 1 of the present application recites a method for managing documents, comprising the steps of receiving, at a centralized document manager, a request for a document from a remote user; selecting, using the document manager, an application service provider amongst a plurality of application service providers based on the request; forwarding the request to the selected application service provider; retrieving the document from the selected application service provider; and sending a merge command to a printing entity requesting that the document be printed with watermark information. Claim 20 recites a system for managing documents, comprising means for receiving a request for a document from a remote user; means for selecting, using a centralized document manager, an application service provider amongst a plurality of application service providers based on the request; means for forwarding the request to the selected application service provider; means for retrieving the document from the selected application service provider; and means for sending a merge command to a printing entity requesting that the document be printed with watermark information. And Claim 39 recites a computer program product, comprising a computer storage medium and a computer program code mechanism embedded in the computer storage medium for causing a computer to manage documents over a computer network The computer program code mechanism comprises a first computer code device configured to receive, at a centralized document manager, a request for a document from a remote user; a second computer code device configured to select, using the document manager, an application service provider amongst a plurality of application service providers

based on the request; a third computer code device configured to forward the request to the

selected application service provider; a fourth computer code device configured to retrieve

the document from the selected application service provider; and a fifth computer code

device configured to send a merge command to a printing entity requesting that the document

be printed with watermark information.

Claim 58 of the present application recites a method for managing documents,

comprising the steps of receiving, at a centralized document manager, a request for a

document from a remote user; selecting, using the document manager, an application service

provider amongst a plurality of application service providers based on the request; retrieving

the document; merging the document with watermark information; and transmitting the

document merged with the watermark information to a printing entity. Claim 65 recites a

system for managing documents, comprising means for receiving a request for a document

from a remote user; means for selecting, using a centralized document manager, an

application service provider amongst a plurality of application service providers based on the

request; means for retrieving the document; means for merging the document with watermark

information; and means for transmitting the document merged with the watermark

information to a printing entity. Claim 72 recites a computer program product, comprising a

computer storage medium and a computer program code mechanism embedded in the

computer storage medium for causing a computer to manage documents over a computer

network. The computer program code mechanism comprising a first computer code device

configured to receive, at a centralized document manager, a request for a document from a

remote user; a second computer code device configured to select, using the document

manager, an application service provider amongst a plurality of application service providers

based on the request; a third computer code device configured to retrieve the document; a

fourth computer code device configured to merge the document with watermark information;

and a fifth computer code device configured to transmit the document merged with the

watermark information to a printing entity.

The Applicants respectfully submit that the cited references, either taken singularly or

in combination, fail to teach receiving a request for a document from a remote user, selecting,

using a centralized document manager, an application service provider amongst a plurality of

application service providers based on the request, and retrieving the document. Thus, the

Applicants submit that the cited references fail to establish a prima facie case of obviousness

with respect to Claims 1, 20, 39, 58, 65, and 72 of the present application.

The Zhao et al. reference describes a technique for the secure distribution of digital

representations that combine encryption and watermarking. The Official Action alleges that

the transaction manager (115) of the Zhao et al. reference is centralized and handles all of the

requests from the copy client (119(i)) and the distribution arrangement (117). The

Applicants respectfully disagree with these assertions. The Zhao et al. reference describes

the distribution of original representations beginning in column 6, on line 33, as beginning

with a request from a user of copy client (119(i)) by inputting information via input device

(131). While the Zhao et al. reference does describe a distribution arrangement (117), this

arrangement is merely acting as a conduit to pass information between the copy client

(119(i)) and the copy server (103(j)). The transaction manager (115) of the Zhao et al.

reference is not a centralized document manager and does not select an application service

provider amongst a plurality of application service providers based on the request for a

document. Rather, the Zhao et al. reference merely describes an input from a user at the input

device (131) that is sent via a connection (i.e., distribution arrangement 117) to a copy server

(103(j)). The selection of which copy server that the copy client should connect to is not

discussed. Such a selection could be made by the user at the input device (131). Clearly, the

transaction manager (115) is not disclosed as selecting an application service provider

amongst a plurality of application service providers based on a request for a document. But

rather the transaction manager (115) merely manages the transactions between copy clients

and the specific copy server to which the transaction manager is a part of.

Accordingly, the Applicants respectfully submit that the Zhao et al. reference fails to

teach receiving a request for a document from a remote user, and selecting, using a

centralized document manager, an application service provider amongst a plurality of

application service providers based on the request.

The Stefik et al. reference is further cited for the teaching of the centralized document

manager recited in Claims 1, 20, 39, 58, 65, and 72. The Official Action cites repository

(101) in Figure 1 of the Stefik et al. reference for the teaching of the centralized document

manager of the present application. The repository (101) is connected to an authorization

repository (102), a rendering repository (103) and a master repository (104). However, the

repository (102) merely provides authorization for access to a digital work that is presumably

stored in the repository (101), the rendering repository (103) merely provides for printing of

the work, and the master repository (104) merely provides identification certificates for the

repository. The authorization repository (102), the rendering repository (103) and the master

repository (104) are not capable of providing the requested document itself.

Furthermore, Figure 5 of the Stefik et al. reference describes a flowchart of the basic steps for digital work creation for printing on a trusted printer. As is evident from a review of steps 502 and 503, the access to a digital work and transfer thereof is established at the outset of the process. The transfer of the digital work occurs prior to the receipt of a user request to print the digital work in step 504. Thus, the process described in Figure 5 does not provide a teaching of receiving a request for a document from a remote user, and selecting, using a centralized document manager, an application service provider amongst a plurality of application service providers based on the request. In Figure 5, the request is provided to repository 2, which already has a copy of the digital work, and thus no application service provider is selected by a centralized document manager based on the request in the process of Figure 5.

Accordingly, the Applicants respectfully submit that the cited references, either taken singularly or in combination, fail to teach receiving a request for a document from a remote user, and selecting, using a centralized document manager, an application service provider amongst a plurality of application service providers based on the request. Thus, the Applicants submit that the cited references fail to establish a prima facie case of obviousness with respect to Claims 1, 20, 39, 58, 65, and 72 of the present application. Thus, the Applicants respectfully request the withdrawal of the obviousness rejections of Claims 1, 20, 39, 58, 65, and 72.

Claims 2-19 are considered allowable for the reasons advanced for Claim 1 from which they depend. These claims are further considered allowable as they recite other

features of the invention that are neither disclosed, taught, nor suggested by the applied references when those features are considered within the context of Claim 1.

Claims 21-38 are considered allowable for the reasons advanced for Claim 20 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed, taught, nor suggested by the applied references when those features are considered within the context of Claim 20.

Claims 40-57 are considered allowable for the reasons advanced for Claim 39 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed, taught, nor suggested by the applied references when those features are considered within the context of Claim 39.

Claims 59-64 are considered allowable for the reasons advanced for Claim 58 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed, taught, nor suggested by the applied references when those features are considered within the context of Claim 58.

Claims 66-71 are considered allowable for the reasons advanced for Claim 65 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed, taught, nor suggested by the applied references when those features are considered within the context of Claim 65.
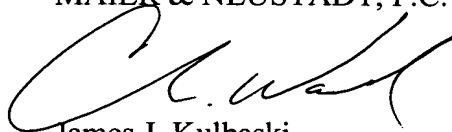
Claims 73-78 are considered allowable for the reasons advanced for Claim 72 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed, taught, nor suggested by the applied references when those features are considered within the context of Claim 72.

Consequently, in view of the above discussion, it is respectfully submitted that the

present application is in condition for formal allowance and an early and favorable

reconsideration of this application is therefore requested.

Respectfully Submitted,

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